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*Attorneys for Defendant
Meijie Faucet Company, Ltd.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

GLOBE UNION INDUSTRIAL CORP.,

Plaintiffs,

VS.

MEIJIE FAUCET COMPANY, LTD.,

Defendant.

Case No. 4:24-cv-05205-HSG

**STIPULATED REQUEST FOR
EXTENSION OF TIME FOR
DEFENDANT'S RESPONSE TO
COMPLAINT AND ORDER**

1 Pursuant to Civil Local Rules 6.2 and 7.12, Defendant Meijie Faucet Company Ltd.
2 (“Defendant” or “Meijie Faucet”) and Plaintiff Globe Union Industrial Corp. (“Plaintiff” or
3 “Globe Union”), by and through their respective counsel, respectfully submit this Stipulation and
4 Proposed Order to extend the deadline for Defendant to answer or otherwise respond to the
5 Complaint in this case.
6

7 1. The current deadline for Meijie Faucet to respond to the Complaint is Friday,
8 January 17, 2025, which was set when Meijie Faucet waived service. Dkt. No. 19.

9 2. Meijie Faucet has only recently engaged litigation counsel, who will be entering
10 an appearance concurrent with this filing.
11

12 3. To enable Meijie Faucet’s litigation counsel to come up to speed on the case, to
13 facilitate possible resolution or streamlining of issues, and in an effort to preserve the Court’s
14 time and resources, the parties have agreed to extend Meijie Faucet’s deadline to respond to the
15 Complaint by 32 days, up to and including February 18, 2025 (as the 17th is Washington’s
16 Birthday (Presidents’ Day)).
17

18 THEREFORE the parties respectfully request that the Court issue an order granting a 32-
19 day extension of time for Defendant to respond to Plaintiff’s Complaint up to and including
20 February 18, 2025.

21 The proposed stipulation would not have any significant impact on the overall schedule
22 for the case, given the early stage of these proceedings. The only previous time modification in
23 the case was the Court vacating the then-scheduled Case Management Conference until after the
24 Defendant appeared. *See* Dkt. No. 18.
25
26
27
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1 IT IS SO STIPULATED.

2
3 Dated: January 15, 2025

Respectfully submitted,

4
5 /s/ Marc David Peters

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Globe Union Industrial Corp.

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20 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**

21 Pursuant to Civil Local Rule 5-1, I hereby attest that concurrence in the filing of this
22 document has been obtained from the other signatories.
23

24 Dated: January 15, 2025

25 /s/ Marc David Peters

26 Marc David Peters (State Bar No. 211725)


27 mdpeters@turnerboyd.com
28

ORDER

BEFORE the Court is the parties' Stipulation and [Proposed] Order to extend the deadline for the Defendant to answer or otherwise respond to the Complaint in this case up to and including February 18, 2025.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED this 16th day of January, 2025.


Honorable Haywood S. Gilliam, Jr.
UNITED STATES DISTRICT JUDGE
NORTHERN DISTRICT OF CALIFORNIA